

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
INTERBANK FUNDING CORP., et al.,	: Case No. 02-41590 (BRL)
	: (Jointly Administered)
Debtors.	:
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IBF FUND LIQUIDATING LLC,	:
	:
Plaintiff,	:
	:
v.	: Adv. Pro. No. 07-1482 (BRL)
	:
CHADMOORE WIRELESS GROUP INC.,	:
CHADMOORE SHAREHOLDER	:
LIQUIDATING TRUST, ROBERT MOORE	:
and STEPHEN RADUSCH,	:
	:
Defendants.	:
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NOTICE OF CROSS-APPEAL

IBF Fund Liquidating LLC (“Fund LLC”), the plaintiff, cross-appeals under 28 U.S.C. § 158(a)(1) to the United States District Court for the Southern District of New York from the Amended Order (docket no. 187) and Judgment (docket no. 188) of the United States Bankruptcy Court for the Southern District of New York (“Bankruptcy Court”) entered in the above-captioned Adversary Proceeding on October 9, 2007.

The Judgment and Amended Order granted summary judgment to Fund LLC on Count VI of the Complaint (“Complaint”). In seeking summary judgment on Count VI of the Complaint, Fund LLC presented to the Bankruptcy Court various legal theories supporting the

grant of summary judgment. The Bankruptcy Court granted Fund LLC summary judgment on Count VI based on one, but not all of the theories.

Defendant Robert Moore (“Moore”) has filed a notice of appeal (docket no. 190) with respect to the Bankruptcy Court’s grant of summary judgment to Fund LLC on Count VI of the Complaint. While, in responding to Moore’s appeal, Fund LLC should be able to raise any and all of the theories it presented below that would justify the District Court upholding the Bankruptcy Court’s grant of summary judgment to Fund LLC on Count VI of the Complaint, out of an abundance of caution, Fund LLC has filed this cross-appeal of the Judgment and Amended Order to preserve its right to present to the District Court the other legal theories that warrant the grant of summary judgment to Fund LLC on Count VI of the Complaint, including that Moore is personally liable to Fund LLC under the Colorado personal liability statute, C.R.S. § 7-102-104 (2006).

The names of all parties to the adversary proceeding and the names, addresses and telephone numbers of the respective attorneys are as follows:

Party	Counsel
<u>Plaintiff/Cross-Appellant,</u> IBF Fund Liquidating, LLC	Kaye Scholer LLP 425 Park Avenue New York, NY 10022 Tele: (212) 836-8000 Attn: Arthur Steinberg, Esq. Aaron Rubinstein, Esq. D. Tyler Nurnberg, Esq. Heath D. Rosenblat, Esq
<u>Defendant/Appellant,</u> Robert Moore	Bainton McCarthy LLC 26 Broadway, Suite 2400 New York, New York 10004 Tele: (212) 480-3500 Attn: J. Joseph Bainton, Esq.

Additional Interested Parties
Securities and Exchange Commission 3 World Financial Center, Room 4300 New York, NY 10281 Attn: Andrew Calamari, Esq. Neal Jacobson, Esq.
Michelman & Robinson, LLP 15760 Ventura Blvd., Suite 500 Encino, CA 91436 Attn: Sanford Michelman, Esq. Mona Z. Hanna, Esq.

Dated: New York, New York
October 19, 2007

IBF FUND LIQUIDATING LLC

By: /s/ Arthur J. Steinberg
Aaron Rubinstein (AR 2083)
Arthur Steinberg (AS 1298)
Heath Rosenblat (HR 6430)

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